

Rejections under 35 U.S.C. § 102(b) are proper only when the applied reference discloses each feature recited in the claims. Applicants submit that both references lack disclosure regarding at least the claimed lubricant supply device found in independent claims 17-19, 22, 31-34 and the means for supplying a lubricant of independent claim 36.

It is well settled that there is a “heavy presumption” that claim terms mean what they say and have the ordinary meaning that would be attributed to those words by persons skilled in the relevant art. *Texas Digital Sys., Inc. v. Telegenix, Inc.*, 308 F.3d 1193, 1202 (Fed. Cir. 2002); see also *K-2 Corp. v. Saloman S.A.*, 191 F.3d 1356, 1365 (Fed. Cir. 1999) (noting that claim construction “is firmly anchored in reality by the understanding of those of ordinary skill in the art”). The Examiner cites member 17 of Nilsson against the lubricant supply features of the claims. Applicants submit that member 17 is for sealing and would not be interpreted by one skilled in the art as being a lubricant supply device. That is, one skilled in the art who is familiar with lubricant supply devices would not consider member 17 as being a device that supplies a lubricant.

Nilsson does mention that the material of member 17 includes PTFE; however, this material only improves friction properties<sup>1</sup> and does not function to supply a lubricating agent. Applicants therefore respectively submit that member 17 of Nilsson does not disclose the lubricant supply features of claims 17-19, 22, 31-34 and 36 such that the rejection thereof under

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<sup>1</sup> See col. 1, lines 44-47 of Nilsson.

35 U.S.C. § 102(b) should be withdrawn. The rejection of dependent claims 21, 23-30 and 35 should likewise be withdrawn at least by virtue of their dependency.

The applied member 25 of Spontelli also does not correspond to or disclose the claimed lubricant supply device. Instead, member 25 is disclosed as including cleaning segments 24 and provides a sealing feature similar to element 17 of Nilsson. Moreover, Spontelli does not disclose the material of member 25 and cannot disclose that it includes a lubricant that is supplied. Therefore, the member 25 of Spontelli does not disclose the lubricant supply device of claims 19 and 33 such that the rejection thereof under 35 U.S.C. § 102(b) should be withdrawn. The rejection of dependent claims 20, 21 and 25 should likewise be withdrawn at least due to them respectively depending from claim 19.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111  
Appln. No.: 10/763,186

Attorney Docket No.: Q79580

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

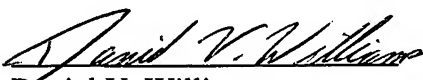
Respectfully submitted,

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